

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

ADELBERG RUDOW DORF &
HENDLER LLC,

Judgment Creditor

v.

Case No.: MJG-01-CV-2600

WILLIAM BOND,

Judgment Debtor

* * * * *

MOTION TO COMPEL

Judgment Creditor Adelberg, Rudow, Dorf & Hendler, LLC (“Adelberg Rudow”), by its attorneys, Andrew Radding and Michael R. Severino, files this Motion to Compel pursuant to Federal Rule of Civil Procedure 45(c)(2)(b), and for cause states:

1. On July 3, 2003, Adelberg Rudow served Notices of Deposition and accompanying subpoenas on Judgment Debtor, William C. Bond’s (“Bond”), counsel, Howard J. Schulman and his professional entity. See attached Exhibits A and B.

2. On July 17, 2003, Mr. Schulman sent an objection to said subpoenas to Adelberg Rudow arguing that the subpoenas “burdened” the attorney/client relationship and raising arguments identical to those raised in his Motion to Quash the Subpoenas to Counsel and/or for Protective Order.

3. Accordingly, Adelberg Rudow hereby adopts and incorporates its Opposition to Bond’s Motion to Quash the Subpoenas to Counsel and/or for Protective Order and arguments raised therein.

WHEREFORE, Judgment Creditor Adelberg, Rudow, Dorf & Hendler, LLC, hereby requests that this Honorable Court enter an Order compelling Howard J. Schulman and Schulman and Kaufman to produce and permit for inspection the documents listed in the attached subpoenas.

Respectfully submitted,

_____/s/_____
Andrew Radding (Bar No. 00195)
Michael R. Severino (Bar No. 25204)
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